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No. 82-812

IN THE

SUPREME COURT OF THE UNITED STATES

October Term, 1982

JOHN R. STEVENSON, CHARLES F. SLOAN AND JOHN E. COOPER

Petitioners,

v.

GENERAL ELECTRIC COMPANY, INTERNATIONAL ASSOCIATION OF MACHINISTS, LODGE 912, INTERNATIONAL ASSOCIATION OF MACHINISTS, LOCAL 647 OF THE UNITED AUTOMOBILE, AEROSPACE AND AGRICULTURAL IMPLEMENT WORKERS OF AMERICA, AND UNITED AUTOMOBILE, AEROSPACE AND AGRICULTURAL IMPLEMENT WORKERS OF AMERICA,

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

BRIEF FOR GENERAL ELECTRIC COMPANY IN OPPOSITION

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QUESTIONS PRESENTED

1. Whether, in the absence of any probative evidence of racial discrimination on or subsequent to June 4, 1969, the earliest date of the applicable statutes of limitations herein, regulation of admission of prelimitations evidence of alleged acts of discrimination and other pre-limitations matters is within the discretion of the District Court?

2. Whether the District Court may exercise discretion in regulating discovery and trial procedure in accordance with well-established rules governing the orderly trial of lawsuits?

3. Whether the Court of Appeals properly sustained the District Court's factual findings that the named plaintiffs did not meet their burden of proof regarding any of their individual claims because those claims were either barred by the statute of limitations or were largely unsupported by any evidence other than their own testimony, and where the District Court found in each instance there was convincing contradictory testimony by the defendant?

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ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

BRIEF FOR GENERAL ELECTRIC COMPANY IN OPPOSITION

OPINIONS BELOW

The order of the Court of Appeals (Pet. App 1-19) will not be reported. The opinion and order of the District Court (Pet. App. 21-46) will not be reported.

JURISDICTION

The judgment of the Court of Appeals was entered on August 16, 1982. The jurisdiction of this Court is invoked under 28 U.S. Code § 1254(1).

STATUTES AND RULES INVOLVED

The relevant provisions of the Civil Rights Acts of 1964, 1866 and 1870, 42 U.S. Code § 2000e *et. seq.*, and 42 U.S. Code § 1981 respectively, and the Federal Rules of Civil Procedure are set forth in Petitioners' Appendix 48-55.

STATEMENT

On March 2, 1977, three black employees and one black former employee of the Respondent General Electric Co.[1] (hereinafter referred to as "GE") filed this action alleging race discrimination in employment at GE's Evendale, Ohio manufacturing plant. Named as defendants were GE; the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America and its Local Union 647 (hereinafter collectively referred to as "UAW"); and the International Association of Machinists (hereinafter referred to as "IAM").[2]

The District Court certified a class of all past, present and future black employees at GE's Evendale, Ohio plant who in promotion, transfer or seniority, might have been discriminated against since July 2, 1965 or might be discriminated against in the future by the defendants. Trial to the Court was held. The District Court entered its findings of facts, conclusions of law and judgment directing that the action be dismissed on the merits. The United States Court of Appeals for the Sixth Circuit affirmed.

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[1] In accordance with Supreme Court Rule 28.1, a list of affiliated companies is included as an Appendix to this Brief.

[2] On July 22, 1977, the International Association of Machinists was dismissed from the case; however, its local Lodge 912 was subsequently added as a substitute defendant. References to the IAM in this brief, therefore, refer to local Lodge 912. The International Association of Machinists, not having been a party in the Court of Appeals, is not properly a Respondent in this Court.

The courts below found on the basis of undisputed evidence that separate bargaining units were established by the National Labor Relations Board in 1949. In the resulting NLRB elections at the Evendale plant, Respondents IAM and its Lodge 912 and Respondents UAW and its Local Union 647 became exclusive collective bargaining representatives of respectively, a skilled craft unit and a production and service unit. *General Electric Co.*, 86 N.L.R.B. 327 (1949). (Pet. App. 3, 24-25) At all times these units were established and maintained pursuant to the above-cited decision of the National Labor Relations Board and the mandates of the National Labor Relations Act that Board certifications be maintained.

The District Court found that from the commencement of the earliest limitations period on June 4, 1969, black employees comprised approximately 20% of the UAW-represented production and service workforce. (Pet. App. 13, 22, 40) An analysis of significant upgrades during the relevant time frame revealed that black employees received 24.87% of such upgrades. (Pet. App. 13, 40) The District Court also analyzed the upgrades to specific job grades and classifications within job grades as well as the selection procedures used and found no evidence of disparate impact or racial discrimination. (Pet. App. 13, 17-18, 37, 41-42) With respect to transfers between the UAW and IAM units, the evidence similarly showed a direct proportion between the number of black applicants considered under the procedure and the number of black applicants accepted. (Pet. App. 14, 42)

Evidence of alleged pre-limitation acts of discrimination and alleged GE policies was admitted or rejected by the District Court based on the relevance of the evidence to the issues being tried. The Court, for example, permitted witness' testimony about an employee's efforts to be upgraded to an IAM carpenters position in 1956 or 1957, as well as permitting other pre-time frame testimony which was

arguably relevant to the manner in which the IAM seniority system was being applied at that time. The District Court declined to hear evidence regarding certain alleged upgrade procedures concededly no longer in effect before the limitations period as well as prelimitations acts of alleged discrimination, as the alleged procedures and acts had no probative value to the issues before it.

The District Court granted broad discovery to the Petitioners and had before it the entire record of promotions made during the time frame in the contested positions. (Pet. App. 7-8, 40-42) The District Court permitted amendment to exhibit and witness lists prior to the opening of the defendants' case as it had permitted such amendments before opening and during the course of plaintiffs' case. After defendants rested, it also permitted the plaintiffs wide scope in rebuttal and months to prepare for and present rebuttal.

The District Court refused to permit the Petitioners to introduce during their rebuttal a discredited exhibit that had been originally proffered by the UAW, because that exhibit had been withdrawn as inaccurate, after Petitioners' questioning. The District Court also declined to enforce requested subpoenas or compel discovery at various points in the trial of matters which, in the context, were unnecessary to plaintiffs' case and which, as in the case of the General Electric's Affirmative Action Plans, presented public policy questions relating to the necessity of disclosure as well as questions of appropriate trial procedure.

The Court did not, as Petitioners assert, apply an improper standard to the Petitioners' retaliation claims but instead found that Petitioners, as plaintiffs, failed to meet their burden of proof where their individual complaints were either time barred or largely unsupported by any evidence other than that individual's own testimony and the defendant had presented "convincing contradictory testimony." (Pet. App. 43-44) Similarly, the Appellate Court did not, as Petitioners claim, "attempt to resolve factual

issues on its own when under Rule 52 . . . the District Judge makes no findings of fact . . . ." (Pet. iii) Instead, the District judge made ample and amply supported findings of fact which the Court of Appeals found to be not "clearly erroneous." (Pet. App. 19)

ARGUMENT

Contrary to Petitioners' assertion, the Court of Appeals and District Court applied well recognized legal principles in the disposition of this case.[3] Insofar as the Petitioners' points relate to GE, the exclusion of certain pre-limitations claims of alleged discrimination is entirely consistent with this Court's decisions in *Teamsters v. United States*, 431 U.S. 324 (1977) and *United Air Lines, Inc. v. Evans*, 431 U.S. 553 (1977). Far from Petitioners' reading, this Court held in *Teamsters* that prelimitations transfer rules are not evidence of post-limitations discrimination—although the class members were "locked into" inferior jobs by such rules. Obviously, pre-limitations acts of individual discrimination have even less probative value. *United Air Lines, Inc. v. Evans, supra.* The argument becomes academic in a situation such as this where there is not the least basis for reversing the District Court and Court of Appeals in their unanimous determination that there was no discrimination in the post-limitations time frame.

The issue concerning the bona fides of GE's seniority system is presented here as a problem concerning the appropriate allocation of the burden of proof. Burden of proof is irrelevant, however, as even Petitioners themselves agree, in the absence of a showing of adverse impact flowing from the application of seniority rules. Both courts below reviewed the evidence pertaining to inter-unit promotional

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[3] Petitioners' factual assertions also, to the extent they do not simply recite the Court's findings are, virtually without exception, unsupported by the record. We note further the inadequacy of the Petition generally under Rule 21.5.

requests and concluded that no such impact had been established.[4]

Similarly, the evidentiary and discovery points raised in the Petition were summarily dismissed upon extensive review by the Court of Appeals which is charged by this Court with the supervision of the district courts in these areas. As the Court of Appeals pointed out, "evidentiary rulings by a trial court as to the exclusion or admission of evidence constitute reversible error only if a substantial right of the party is affected. Fed. R. Evidence, 103(a)." (Pet. App. 8-9) Further, as to discovery, the Court of Appeals noted that "a trial judge has wide latitude in discovery matters, and should only be reversed for clear abuse of discretion." (Pet. App. 7)

Where the evidence so clearly establishes the impropriety of the Petitioners' substantive claims, the Court below could hardly do otherwise than affirm the District Court's evidentiary and discovery rulings. "He who seeks to have a judgment set aside because of an erroneous ruling carries the burden of showing that prejudice resulted." *Palmer v. Hoffman*, 318 U.S. 109, 116 (1943). The finding by the Court of Appeals that plaintiffs had "full access to the data relevant to this action" provides a full answer to the various discovery contentions made by the Petitioners. (Pet. App. 6, 18) *See Carter Electric Co. v. Travelers Indemnity Co.*, 382 F.2d 567, 571-572 (10th Cir. 1967). Similarly, the claims regarding abuses of discretion in permitting addition of new exhibits and witnesses, the exclusion of the tainted UAW exhibit and the treatment of the individual claims were all concretely answered by the Court of Appeals. The District Court's analysis of the individual claims is precisely the analysis this court mandated in *Texas Dept. of*

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[4] Further, Petitioners failed totally to present evidence showing that any party's intention in maintaining the two separate units was other than complying with the nation's labor laws. *See Pullman Standard Div. v. Swint*, Nos. 80-1190 and 1193, 50 U.S.L.W. 4425 (April 27, 1982).

Community Affairs v. Burdine, 450 U.S. 248 (1981). The Court's dispositions of the trial procedure matters were also completely consistent with well established principles of law. *See Davis v. Duplantis*, 448 F.2d 918, 921 (5th Cir. 1971).

CONCLUSION

The Petition for a Writ of Certiorari should be denied.

Respectfully submitted,

/s/ William K. Engeman

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CERTIFICATE OF SERVICE

I hereby certify that I have served three copies of the foregoing Brief for General Electric Company in Opposition upon Richard Halberstein, Esq., 625 North Carolina Avenue, S.E., Washington, DC 20003; Bernard C. Fox, Esq., 601 Gwynne Building, 602 Main Street, Cincinnati, OH 45202; Walter L. Sales, Esq., Third Floor, M.E. Taylor Building, Louisville, KY 40202; and Paul H. Tobias, Esq., Tobias & Kraus, 911 First National Bank Building, Cincinnati, OH 45202, by certified mail, return receipt requested, this 16th day of December, 1982.

/s/ William K. Engeman

ARGENTINA

General Electric Argentina Sociedad Anonima
SADE Sociedad Anonima Constructora, Commercial, Industrial, Financiera, Inmobiliaria de Mandatos

AUSTRALIA

Australian General Electric Limited
Australian General Electric Properties Limited
Australian General Electric (Sales) Limited
Australian Metallurgical Coal Pty. Ltd.
Bunbury Rewinds Pty. Ltd.
Central Queensland Coal Associates
C. Dorman Pty. Ltd.
Endeavour Minerals N.L.
General Electric—Goninan Engineering Services Limited
General Electric Information Services, Pty. Limited
General Electric (Plastics) Australia Pty., Ltd.
General Electric—Rickard Limited
General Electric—Mobile Radio Pty. Limited
Goldfields Rewinds Pty. Ltd.
Goldsworthy International Limited
Goldsworthy (Japan) Limited
Goldsworthy Mining Limited
Hay Point Services Pty. Ltd.
Jones and Rickard (Pty.) Limited
Kanava Manufacturing Pty. Limited
Kanava Pty. Ltd.
McCamey Iron Ore Associates
McCamey Mining Limited
Mount Goldsworthy Mining Associates
Rank Appliances Distribution Pty. Ltd.
Rank—General Electric Housewares Pty. Ltd.
Rank—General Electric Major Appliances Pty. Ltd.

AUSTRALIA (cont'd)

South Alligator Joint Venture
F. R. Tulk & Co. Pty. Limited
Utah Beta Pty. Limited
Utah Metals and Minerals Pty. Ltd.

AUSTRIA

General Electric Technical Services GmbH
"General Electric" Informations-Service Ges. m.b.H.
Carboloy GmbH

BAHRAIN

Middle East Engineering Limited

BELGIUM

S.A. General Electric Information Services N.V.

BERMUDA

Bridgport Company Limited
Dahlia Company Limited

BRAZIL

Banco Brasileiro de Investimentos Ipiranga S.A.
Consorcio SADE-MERVAL S.C.
Consorcio TECHINT-SADE-Contecsa S.C.
Fundicao Tecnica Nacional S.A.
General Electric do Brasil S.A.
General Electric do Nordeste, S.A.—Produtos Electricos
Inducon do Brasil, Capacitores S.A.
Itamon-Construcoes Industrias Ltda.
Mineracao Marex Ltda.
Precon-SADE-Presade S.C.
Sade-Sul Americana de Engenharia S.A.
Samarco Mineracao S.A.
Sociedade Intercontinental de Compressores Hermeticos
Storno do Brasil-Industria e Comercio de Radio Communicacoes, Ltda.

BRAZIL (cont'd)

Tivoli Comercio e Participacao Ltda.
UMON-Engenharia de Montagem Ltda.
Utah International Participacoes Ltda.
VIGESA-Villares Geracao Electrica S.A.

CANADA

Allenwest (Canada) Limited
Amalgamated Electric Corporation, Ltd.
Argonaut Construction Co. Ltd.
Benjamin Electric Manufacturing Company of Canada Limited
Buell Envirotech, Ltd.
Camco Inc.
Canadian General Electric Company Limited
Canadian General Electric International Limited
Canadian Nuclear Equipment Suppliers Limited
Dominion Engineering Company Limited
Dominion Engineering Works Limited
Genelcan Limited
Genelcan Realty Limited
Genelcom Limited
General Electric Medical Systems Limited
Gescan Limited
Montreal Armature Company Limited
Radio Valve Company Limited
Riverdale Park, Ltd.
Rupert Inlet Copper Mines Ltd.
Smith and Stone Inc.
W. L. Stevens Ltd.
Widney Well Servicing (1971) Limited

CHILE

Electromat, S.A. Fabrica de Materiales Electricos
Propriedades Mineras Limitada

CHINA

The China Car and Foundry Company Limited

COLOMBIA

Compressores Andinos, S.A.
Condisa Limitada Ingenieros Contratistas S.A.
Consorcio Distral-SADE Ltda.
General Electric de Colombia, S.A.
Sud Americana de Electrificacion S.A.

CUBA

Bombillos General Electric de Cuba, S.A.
Genelectric Rayos-X, S.A.
General Electric Cubana, S.A.
Manufacturera General Electric, S.A.

DENMARK

General Electric Nuclear Medical ApS
Isua Minekompagni I/S
Storno A/S

DOMINICAN REPUBLIC

Sade Dominicana S.A.

ECUADOR

Sadelmi Ecuatoriana S.A.

FRANCE

CFM International, S.A.
Calma et Cie
Eurolan, S.A.
Fabrications Mecaniques de l'Atlantique, S.A.
General Electric Information Services, S.A.
General Electric Plastics S.A.R.L.
Intersil Datel, S.A.R.L.

FRANCE (cont'd)

L'Eclairage Technique, S.A.
Maneurop, S.A.
SNEF Electro Mecanique (S.A.R.L.)
Storno S.A.
Technibel, S.A.
W.Q.S. France S.A.R.L.

GERMANY

Calma GmbH
ELEKLUFT Elektronik-und Luftfahrtgerate GmbH
ELEKLUFT Versorgungseinrichtung GmbH
General Electric Informations Service GmbH
General Electric Plastics GmbH
Intersil Datel GmbH
Quarzglas GmbH
Storno Electronic GmbH
Unterstutzungskasse der Deutschen General Electric Gesellschaften GmbH
Westdeutsche Quarzschmelze GmbH

HONG KONG

Electronic Industry Limited
Intersil Datel (HK) Ltd.

INDIA

Elpro International Limited
International General Electric Company (India) Limited
Intersil (India) Limited

INDONESIA

International General Electric Company Inc. of Java
P. T. Tropic Endeavour Indonesia

IRAN

Iran Electrical and Mechanical Service Company
Iranian Compressor Manufacturing Company
Pars Appliance Manufacturing Company

IRELAND

Atlantic Projects Company Ltd.
ECCO, Limited
The E. I. Company Limited

ITALY

Calma Italia S.R.L.
Carboloy S.p.A.
CGE-Compagnia Generale di Elettricita S.p.A.
CGE-Compagnia Gererale Elettromeccanica S.p.A.
Fabbrica Italiana Apparecchiature RadioElettriche S.p.A.
General Electric Information Services S.p.A.
General Electric Plastics Italia S.p.A.
INELCO-Elettronica Professionale, S.p.A.
SADELMI-COGEPI Compagnia Generale Progettazioni e Installazioni S.p.A.
Societa Nazionale delle Officine di Savigliano S.p.A.
Turbomotori Internazionale S.p.A.

JAPAN

Asahi Diamond Industrial Company, Limited
Datel Kabushiki Kaisha
Drive Systems Company, Ltd.
Engineering Plastics, Ltd.
Eye Lighting Systems Corporation
General Aircon, Ltd.
General Aircon Distribution, Ltd.
General Electric Japan, Ltd.
Information Services International-Dentsu, Ltd.
Japan Nuclear Fuel Company, Limited

JAPAN (cont'd)

Nippon ESGE K.K.
Specialty Materials Technical Center (Japan), Inc.
Tokyo Kucho, Ltd.
Toshiba Corporation
Toshiba Electronic Systems Co. Ltd.
Toshiba General Electric Finance Corporation
Toshiba Silicone Company, Ltd.

KENYA

General Electric (Kenya) Ltd.

LIBERIA

Bulkers Limited
Marcona Carriers, Ltd.
Marcona Conveyor Corporation
Orco Green Corporation
Orco Orange Corporation
Orco Shipping Corporation
Utah Shippers Inc.
Utah Transport Inc.

MALAYSIA

General Electric (USA) Audio Malaysia Sdn. Bhd.
General Electric (USA) Television Sdn. Bhd.

MEXICO

Aparatos Electricos de Acuna, S.A. de C.V.
CCC de Mexico, S.A. de C.V.
Compania Armadora, S.A. de C.V.
Compania Utah, S.A. de C.V.
Datacom de Mexico, S.A. de C.V.
ECOM de Mexico, S.A. de C.V.
Electroaparatos de Mexico, S.A. de C.V.
Electro Componentes de Mexico, S.A. de C.V.

MEXICO (cont'd)

Generacion Electrica Nacional S.A. de C.V.
General Electric de Mexico, S.A. de C.V.
Industrial Controls de Mexico S.A. de C.V.
Productos de Control, S.A. de C.V.
Radio Componentes de Mexico, S.A. de C.V.
Sistemas de Baterias, S.A. de C.V.
Sociedad de Motores Domesticos S.A. de C.V.
URA-TEC S.A. de C.V.

NETHERLANDS

General Electric Information Services B.V.
General Electric Plastics B.V.
I. B. Noordland B.V.
B.V. Electrotechnische Fabriek J.B. Van Wijnsberge en Zoon
Specialty Materials International B.V.

NEW ZEALAND

New Zealand General Electric Company Limited
Rank Appliances New Zealand Pty. Limited
Waipipi Iron Sands Limited

NIGERIA

American GE of Nigeria
General Electric USA (Nigeria) Limited
Sadelmi Nigeria Limited

NORWAY

General Electric (USA) Information Services A/S
Medirad Medical AS

PANAMA

Marcona International, S.A.
Private Investment Company for Asia S.A.
Utah Carriers, S.A.

PHILIPPINES

Agricultural Needs, Inc.
General Electric Philippines, Inc.
General Electric Philippines Meter and Instrument Co., Inc.
Philippine Appliance Corporation
Philippine Electric Corporation
Philippine Electrical Manufacturing Company
Philippine Glass Bulbs, Inc.
Philacor Realty and Development Corporation
Pinagkaisa Realty Corporation

PORTUGAL

General Electric Portuguesa, S.A.R.L.

PUERTO RICO

General Electric Anasco, Inc.
General Electric Circuit Breakers, Inc.
General Electric Controls, Inc.
General Electric Credit and Leasing Corporation of Puerto Rico
General Electric Credit Corporation of Puerto Rico
General Electric del Caribe, Inc.
General Electric GEPOL, Inc.
General Electric Indicating Devices, Inc.
General Electric Industrial Products, Inc.
General Electric Low Voltage Products, Inc.
General Electric Pilot Devices, Inc.
General Electric Power Products, Inc.
General Electric Protective Devices, Inc.
General Electric Reconstruccion Industrial Corporation
Industrial Control of Puerto Rico
International General Electric Puerto Rico, Inc.
Power Breakers, Inc.
Precision Protective Devices, Inc.
Protective Relays, Inc.

PUERTO RICO (cont'd)

Ventas de General Electric Controles, Inc.
Wiring Devices of Puerto Rico, Inc.

SAUDI ARABIA

Jamjoom Electrical Distribution Assemblies Company, Ltd.
Middle East Engineering Limited Saudi Arabia
SADELMI Shaker Tamimi Construction Company
The Saudi America General Electric Company Limited

SINGAPORE

Electronic Components of General Electric (USA) Private Limited
General Electric (U.S.A.) Appliance Components Private Limited
General Electric (U.S.A.) Aviation Service Operation Pte. Ltd.
General Electric (U.S.A.) Consumer Electronics Private Limited
General Electric (U.S.A.) Controls Private Limited
General Electric (U.S.A.) Hermetic Motor Operation Private Limited
General Electric (U.S.A.) Housewares Private Limited
General Electric (U.S.A.) Television and Appliance Private, Limited
Intersil Singapore (Pte.) Limited
Watt & Akkermans Pte. Ltd.

SOUTH AFRICA

Ajax Manufacturing Company (Pty.) Limited
Allenwest (Cape) (Pty.) Limited
Allenwest-GE Manufacturing (Pty.) Limited
Allenwest-GE Sales (Pty.) Limited
B-H Electronics (Proprietary) Limited

SOUTH AFRICA (cont'd)

Charomel Investments (Pty.) Ltd.
Defy Agencies (Pty.) Limited
Defy Air Conditioners (Pty.) Ltd.
Defy Industries (Pty.) Limited
Defy Investments (New Castle) (Pty.) Ltd.
Defy Investments Pretoria (Pty.) Ltd.
Defy Sales EP (Pty.) Ltd.
Defy Sales Western Cape (Pty.) Ltd.
ECC Enterprises (Pty.) Ltd.
EICSA (Proprietary) Limited
Gaycas (Pty.) Ltd.
General Electric South Africa (Proprietary) Limited
Hartmor Fluorite (Proprietary) Limited
Inkongweni (Pty.) Ltd.
Lease Air (Pty.) Ltd.
Magnet Wires (Proprietary) Limited
Manchester Property Investments (Pty.) Ltd.
Mitben Property Investments (Pty.) Ltd.
Newcastle Flats (Pty.) Ltd.
Petta Properties (Proprietary) Limited
Polly's Kloof Mining Company (Proprietary) Limited
Reid & Mitchell (Pty.) Limited
R & M Electrical Sales (Pty.) Limited
Simplex Electric of South Africa (Pty.) Limited
Simplex-GE Lighting (Pty.) Limited
South African General Electric Company (Pty.) Ltd.
Southern Sphere Coal (Proprietary) Limited
Southern Sphere Mining and Development Company (Proprietary) Limited
Southern Sphere Uranium (Proprietary) Limited
Wireohms South Africa (Pty.) Ltd.

SPAIN

General Electric (U.S.A.) Information Services, S.A.
General Electric Electromedicina, S.A.

SPAIN (cont'd)

International General Electric Company of Spain, S.A.
Sociedad Anonima de Ingenieros Contratistas

SWAZILAND

General Electric Limited

SWEDEN

General Electric (USA) Information Services AB
International General Electric Aktiebolag AB
Svenska Medirad A.B.
Svenska Storno AB

SWITZERLAND

General Electric Information Services AG

TAIWAN

Taian Electric Manufacturing Company
United Asia Electric Company

TURKEY

General Elektrik Turk Anonim Sirketi

UNITED ARAB EMIRATES

Middle East Engineering Limited—U.A.E.

UNITED KINGDOM

Allenwest Electrical Insulators Limited
Allenwest Limited
Allenwest EAC Limited
Cange Limited
Carboloy Ltd.
Cema (U.K.) Limited
Clang Limited
Claytat Limited

UNITED KINGDOM (cont'd)

DMR Electro Magnets Limited
Dynamo & Motor Repairs Limited
Dynamo & Motor Repairs (South Wales) Limited
Dynamo & Motor Repairs (Stockton) Limited
Dynamo & Motor Repairs (Tyne and Wear) Limited
Dynamo & Motor Repairs (Wembley) Limited
Engineering Polymers Ltd.
GEISCO Limited
Group Four Electronics Limited
Hackbridge-Faraday Electronics Limited
International General Electric Company of New York Limited
Intersil Datel (U.K.) Limited
N.C. Joseph Limited
J.W. Morgan & Son, Limited
Optech Power Systems, Ltd.
Potters Electrical Repair Company Limited
Process Control Gear Limited
Sadelmi Limited
Simplex Conduits Limited
Simplex Electric Company Limited
Simplex Export Limited
Simplex (FAL) Limited
Simplex (Fans & Ballasts) Limited
Simplex-GE General Pension Trustees Limited
Simplex-GE Holdings Limited
Simplex-GE Manufacturing Limited
Simplex-GE Limited
Simplex-GE Staff Pension Trustees Limited
Simplex (Lighting) Limited
Simplex (Power Centre) Limited
Simplex (Wiring Devices) Limited
Simplex Wiring Systems Limited
Smithlite Limited

UNITED KINGDOM (cont'd)

Storno Limited
The Benjamin Electric Limited
The Electrical Apparatus Company Limited
The Reason Manufacturing Company
The Wallacetown Engineering Company Limited
Tyne & Wear Electrical Company Limited
Utah Minerals (U.K.) Limited
Wallacetown Control Systems Limited
Wallacetown Properties Limited

UNITED STATES

Acquisition Funding Corporation
Adobe Canyon Corporation
Aircraft Services Corporation
Aircraft Services Limited Partnership
Alton Minerals Inc.
Alton Mining Corporation
Amfac Insurance Services, Inc.
A.P.-GERECCO Ltd.
Applied Materials, Inc.
Arlington Telecommunications Corporation
Arvada Fremont Developers
Atlantic Plant Maintenance, Inc.
Banking Systems, Inc.
Bay Farm Island Inc.
Benerson Corporation
Biological Energy Corporation
CBI Nuclear Company
CFM International, Inc.
Calma Company
Calma Company of Virginia
Calmadisc, Inc.
Castle Oaks Corporation
Chemico Air Pollution Control Corporation
Chemico Basic Corporation

UNITED STATES (cont'd)
Chemico Engineering Co., Ltd.
Claremont Management Co.
Clinton Employment Center Associates
Commonwealth, Inc.
Commonwealth Properties, Inc.
Comwe, Inc.
Consumer Communications Corporation
Creative Credit Services, Inc.
Cyprus Pima Associates
Diamond Oaks Associates
Diamond Oaks Corporation
East Erie Commercial Railroad
Ebbert's Homes VI
Ebbert's Homes VII
ECOGE/U.S., Inc.
Electric Transport Inc.
Enercom, Inc.
Evansville Cable TV, Inc.
Feather River Coal Company
Fremont Coal Company
Fremont Development Inc.
Full Service Leasing Corporation
Garrison-Petaluma Associates
GE Interactive Graphics, Inc.
GECC Escrow Services, Inc.
GECC Financial Corporation
GECC Hawaii Leasing Corporation
General Electric Asia Capital Corporation
General Electric Broadcasting Company, Inc.
General Electric Broadcasting Company of Colorado, Inc.
General Electric Cablevision Corporation
General Electric Credit and Leasing Corporation
General Electric Credit Auto Lease Inc.
General Electric Credit Corporation
General Electric Credit Corporation of Delaware

UNITED STATES (cont'd)

General Electric Credit Corporation of Georgia
General Electric Credit Corporation of Tennessee
General Electric Credit International, N.V.
General Electric Environmental Services, Inc.
General Electric Information Services Company
General Electric International Operations Company, Inc.
General Electric International Sales Company
General Electric Investment Corporation
General Electric Mortgage Corporation
General Electric Mortgage Corporation of Delaware
General Electric Mortgage Insurance Corporation
General Electric Mortgage Insurance Corporation of Florida
General Electric Overseas Capital Corporation
General Electric Radio Services Corporation
General Electric Real Estate Credit Corporation
General Electric Real Estate Equities, Inc.
General Electric Realty Corporation
General Electric Technical Services Company, Inc.
General Electric Uranium Management Corporation
General Electric Venture Capital Corporation
General Electric Video, Inc.
Genetic Sciences Corporation
Great Western Silicon Corporation
Harbor Bay Isle Associates
L. E. Hawkins Contractors, Inc.
High Voltage Breakers, Inc.
Holiday Pines
Holiday Pines Service Corp.
Homemakers Finance Service, Inc.
Homemakers Loan & Consumer Discount Company
Hydraulic Turbines, Inc.
Instructional Industries Inc.
Intersil, Inc.

UNITED STATES (cont'd)

Intersil International, Inc.
Isla del Sol, Inc.
Kun-Yong of Korea, Ltd.
LVO Data Systems, Inc.
LVO 1971 Exploration Program
LVO 1972 Exploration Program
LVO 1972 Exploration Program II
Ladd Bataan, Inc.
Ladd Exploration Company
Ladd Ilolos, Inc.
Ladd Italiana S.p.A.
Ladd Mindoro, Inc.
Ladd Overseas Corporation
Ladd Petroleum Corporation
Lake Adair Corporation
Lambda Technology, Incorporated
Little Medicine Development Company
Locke Insulators, Inc.
Lucky Mc Exploration Corp.
Lucky Mc Uranium Corporation
Management and Technical Services Company
Marcona Greenland Company
Marcona, Inc. (Delaware)
Marcona (N.Z.) Company
Marcona New Zealand, Inc.
Marcona Ocean Industries, Ltd.
Mariposa Mining Company
Matewan Minerals Inc.
Metropolitan REIM
Middle East Technical Services Company
Midwest Electric Products, Inc.
Minera Utah de Chile Inc.
Minera Utah de Colombia Ltd.
Monogram General Agency of Florida, Inc.

UNITED STATES (cont'd)

Monogram General Agency of Kentucky, Inc.
Monogram General Agency of Mississippi, Inc.
Monogram General Agency of North Carolina, Inc.
Monogram General Agency of South Carolina, Inc.
Monogram General Agency of Texas, Inc.
Monogram General Insurance Agency, Inc.
Multi-Craft Installation Services, Inc.
Park Place Developers, Ltd.
Parker County Pipeline Company
Pathfinder Mines Corp.
Pathfinder Mines Corporation
Pembroke Coal Company
Petaluma Center, Inc.
Powers Ferry Vantage Associates
Puritan Excess and Surplus Lines Insurance Company
Puritan Insurance Company
Puritan Life Insurance Company
Puritan Title Insurance Company
Ridgeview Management Company
Redwood Coal Company
Rolling Hills Corp.
Rolling Hills Ranch
Sadelmi New York, Inc.
San Juan Coal Company
Shirley Basin Service Company
Sierra Coal Company
Software International Corporation
Southern Sphere Holdings Limited
Springer Mining Company, Inc.
Stamford Square Associates
Stations Associates
Tau Epsilon Music, Inc.
Telesoftware, Inc.
Terradex Corporation
Terzack, Inc.

UNITED STATES (cont'd)

Tomorrow Syndication, Inc.
Trafalgar Community Developers, Inc.
Trafalgar Credit Corporation
Trafalgar Developers of Florida, Inc.
Trafalgar Developers, Inc.
Trafalgar Realty, Inc.
Uintah Corporation
Utah Australia Limited
Utah Construction & Mining Co.
Utah Development Company
Utah Exploracoes Mineiras (Portugal) Inc.
Utah Exploration Inc.
Utah Far East Inc.
Utah International Inc.
Utah International Finance Corp.
Utah—Marcona Corporation
Utah Mines Ltd.
Utah Pacific Inc.
Utah Saudi Arabia Inc.
Utah South Africa Inc.
VHD Disc Mfg. Co.
VHD Electronics, Inc.
VHD Programs, Inc.
Vandenberg Village Development Company
Victor X-Ray Corporation
Victoria Coal Company
Yacht & Racquet Club of Boca Raton

URUGUAY

General Electric de Uruguay S.A.

VENEZUELA

General Electric de Venezuela, S.A.
Indelec S.A. Industrias Electronicas
Manufacturera de Aparatos Domesticos S.A.

VENEZUELA (cont'd)

Maquinarias Venequip S.A.
Sociedad Financiera Credival C.A.
Sud Americana de Electrificacion, S.A.
Terrenos y Maquinarias Termaq S.A.
Turbinas y Mecanica C.A.
Venezolana de Compresores y Motores S.A.
Vidriolux, C.A.

ZAMBIA

Allenwest (Zambia) Limited

ZIMBABWE

General Electric (USA) of Zimbabwe (Private) Ltd.
Simplex-GE (Private) Limited